

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

UNITED STATES OF AMERICA

V.

NO. 4:19CR316  
(Judge Jordan)

MOSES MOREIRA

**FACTUAL BASIS**

THE UNITED STATES GRAND JURY CHARGES:

The Defendant, **Moses Moreira**, hereby stipulates and agrees that at all times relevant to the Indictment herein, the following facts were true:

1. That the Defendant, **Moses Moreira**, who is entering a plea of guilty, is the same person charged in the First Superseding Indictment.
2. That the events and conduct described in the First Superseding Indictment occurred in the Eastern District of Texas and elsewhere.
3. **Moreira** and his co-conspirators concocted false identities and false stories to befriend and romance victims.
4. **Moreira** and his co-conspirators communicated with each other by phone, email, and text message regarding the scheme to defraud.
5. **Moreira** and his co-conspirators requested money from victims under false pretenses, representations and promises.
6. **Moreira** and his co-conspirators received money from these victims in various forms, including wire transfers, cash, and cashier's checks.
7. **Moreira** and his co-conspirators opened bank accounts for the purpose of receiving money from the victims.

8. **Moreira** and his co-conspirators used victim money for personal purchases.
9. **Moreira** and his co-conspirators converted victim money for use in international shipping.
- 10 **Moreira** and his co-conspirators acted willfully and with the intent to defraud.
11. **Moreira** and his co-conspirators caused wire transmissions that affected interstate and foreign commerce.
12. On or about the date set forth below, in Carrollton, Texas, in the Eastern District of Texas and elsewhere, **Moreira**, for the purpose of executing the scheme described above, knowingly transmitted and caused to be transmitted by means of wire communications in interstate commerce the writings, signs and signals, described below resulting in money being fraudulently deposited into an account controlled by **Moreira**:

Date (On or About)	Description of Interstate Wire Transmission
December 17, 2018	Interstate wire transmission caused by <b>Moreira</b> during deposit of FV1's \$100,000 cashier's check, drawn on a BNY Mellon New Jersey account, into Independent Bank account with number ending in 8298, controlled by <b>Moreira</b>

**DEFENDANT'S SIGNATURE AND ACKNOWLEDGMENT**

13. I have read this Factual Basis and the First Superseding Indictment and have discussed them with my attorney. I fully understand the contents of this Factual Basis and agree without reservation that it accurately describes the events and my acts.

Dated: 3/25/21

  
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MOSES MOREIRA  
Defendant

**COUNSEL FOR DEFENDANT AND ACKNOWLEDGMENT**

14. I have read this Factual Basis and the First Superseding Indictment and have reviewed them with my client. Based upon my discussions with the Defendant, I am satisfied that the Defendant understands the Factual Basis and the First Superseding Indictment.

Dated: 3/25/21

  
Denise S. Benson  
DENISE S. BENSON  
Attorney for Defendant